

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 3 CASES LISTED IN
EXHIBIT A OF PLAINTIFFS' NOTICE OF
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT REPLIES OF
NICOLETTE SIGRID HORBACH, M.D. FOR WAVE 3**

Come now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert reply filed against Nicolette Sigrid Horbach, M.D. for Ethicon Wave 1, Dkt. 2235. While Defendants filed a "new" response in opposition in Wave 3, this response largely repackages their prior responses (in many places it is simply copied and pasted) and primarily argues the Court should replicate its Wave 1 Order on Dr. Horbach. As such, Plaintiffs respectfully request the Court grant Plaintiffs' motion, for the reasons expressed in the Wave 1 briefing.

Dated: October 21, 2016

Respectfully submitted,

/s/ Aimee H. Wagstaff

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Aimee H. Wagstaff

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